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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:
PG&E CORPORATION
- and -
PACIFIC GAS AND ELECTRIC COMPANY,
Debtors.
<input checked="" type="checkbox"/> Affects Both Debtors
<input type="checkbox"/> Affects PG&E Corporation
<input type="checkbox"/> Affects Pacific Gas and Electric Company

Case No. 19-30088 (DM) (Lead Case)

Chapter 11

(Jointly Administered)

**NOTICE OF JOINDER BY FRT IN
SECURITIES LEAD PLAINTIFF PERA'S
OBJECTION TO REORGANIZED
DEBTORS' MOTION TO APPROVE
SECURITIES ADR AND RELATED
PROCEDURES FOR RESOLVING
SUBORDINATED SECURITIES CLAIMS**

1 Financial Recovery Technologies (“FRT”) hereby submits this Notice of Joinder (the
2 “**Joinder**”) to Securities Lead Plaintiff’s Objection to Reorganized Debtors’ Motion to Approve
3 Securities ADR and Related Procedures for Resolving Subordinated Securities Claims (the
4 “**Securities ADR Objection**”) in opposition to Reorganized Debtors’ Motion to Approve
5 Securities ADR and Related Procedures for Resolving Subordinated Securities Claims [Docket
6 No. 8964] (the “**Securities ADR Motion**”).

7 FRT is a leading technology-based services firm that helps the investment community
8 identify eligibility, file claims, and collect funds made available in securities and antitrust class
9 actions and other recovery opportunities worldwide. It submitted claims for 42 Claimants
10 (“**Claimants**”), holders of Securities Claims¹ and creditors in the chapter 11 bankruptcy cases
11 (the “**Chapter 11 Cases**”) of the above-captioned reorganized debtors (the “**Debtors**”, or as
12 reorganized pursuant to the Plan, the “**Reorganized Debtors**”). These Claimants had at least
13 \$1.36B in losses across 1,656 total accounts. Each Claimant expressly authorized FRT to submit
14 claims on their behalf pursuant an Authorization to File (“**ATF**”). The ATFs included Powers of
15 Attorney to take various actions including court submissions like this Joinder.

16 In support of this Joinder, FRT respectfully states as follows:

17 **JOINDER AND RESERVATION OF RIGHTS**

18 1. FRT hereby joins the Securities ADR Objection filed by the Public Employees
19 Retirement Association of New Mexico’s (“Securities Lead Plaintiff” or “PERA”) on September
20 28, 2020. FRT joins the Securities ADR Objection in full, for all the reasons stated therein, and
21 reserves all rights.

22 2. In addition to all the reasons stated in the Securities ADR Objection, which FRT
23 hereby incorporates by reference and joins, FRT underscores that Debtors’ proposal outlined in
24 their Securities ADR Motion is transparently unfair because it increases Reorganized Debtors’
25

26 ¹ Capitalized terms not defined herein shall have the meaning ascribed to them in the Securities
27 ADR Objection (as defined herein) and the Securities ADR Motion (as defined herein), as
28 applicable.

1 bargaining power for resolving the very wrongdoing for which they are accused, including by
2 granting Reorganized Debtors inappropriate authority over the selection of, payment to, and
3 submissions before proposed mediators. In the event that the Court adopts some form of ADR
4 process, we believe it is imperative that the Court select a nationally-recognized mediator
5 experienced in securities damages matters, who will be compensated by all parties. The unfair
6 and inefficient aspects of the present Securities ADR Motion are incurable.

7 **CONCLUSION**

8 For all of the foregoing reasons, FRT respectfully joins Securities Lead Plaintiff's request
9 that this Court enter an order denying the Securities ADR Motion, as well as granting such other
10 and further relief as may be just and proper.

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12
13 Dated: October 5, 2020

Respectfully submitted,

14 By: 

15 Michael Cotter, President & COO

16 Financial Recovery Technologies
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